

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

\_\_\_\_\_  
NATURE ISLAND INVESTMENT COMPANY :  
LTD.,

Plaintiff,

v.

CDC GLOBELEQ,

Defendants.

C.A. NO.: 05-10377-GAO

**ANSWER**

\_\_\_\_\_  
Defendant CDC Group plc (sued herein as “CDC Globeleq”) (“CDC”) by its  
attorneys Bainton McCarthy LLC and Campbell Campbell Edwards & Conroy for its answer to  
the complaint of Plaintiff Nature Island Investment Company, LTD:

1. Denies the averments of paragraphs 1, 3, 5, 6, 12, 14, 15, 16, 17, 28 through the  
first paragraph numbered “32” (including both paragraphs numbered “31”), the second paragraph  
numbered “32” through 37, 39 through 41, and 43 through 45 thereof.

2. States that it lacks knowledge or information sufficient to form a belief as to the  
truthfulness of the averments of paragraphs 2 and 4 thereof.

3. Denies the averments of paragraphs 7, 8, 10, 11, 18, 19, 20 and 21, thereof except  
states that representatives of Plaintiff had communications with West Griffin, Greg Ossadetz and

other agents of CDC regarding the topic of the sale of CDC's interest in Domleq, a power plant located in the Dominican Republic.

4. States that it lacks knowledge or information sufficient to form a belief as to the truthfulness of the averments of paragraphs 9 and 13 thereof, except denies that CDC made any representations to Plaintiff either directly or indirectly.

5. States that the complaint does not contain any paragraphs numbered 23 through 25, inclusive.

6. Denies the averments of paragraphs 22 and 26, except states that CDC ultimately sold its interest in Domleq to a person other than Plaintiff whose offer to purchase that interest was superior to any offer made by Plaintiff following a sales process conducted in good faith and in accordance with high ethical standards.

7. Repeats and reavers the averments of paragraphs 1 through 6 hereof in response to the averments of paragraphs 27, the second paragraph numbered "31," 38 and 42 thereof.

**AS AND FOR A FIRST DEFENSE, AVERS;**

8. This Court lacks jurisdiction over the person of CDC.

**AS AND FOR A SECOND DEFENSE, AVERS:**

9. The complaint fails to state any claims upon which relief can be granted.

WHEREFORE CDC demands judgment in its favor dismissing Plaintiff's complaint and awarding it its costs of this action, together with such other, further or different relief as to the Court may seem just and proper.

Dated: New York, New York  
May 17, 2005

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-- and --

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